

FORM TO BE USED BY PRISONERS IN FILING A COMPLAINT  
 UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. § 1983  
 in the UNITED STATES DISTRICT COURT for the SOUTHERN DISTRICT of GEORGIA

SHAQUILLE RASHAD JENKINS

U. S. DISTRICT COURT  
 Southern District of Ga.  
 Filed in Office

11:30 AM

May 7, 2024

[Signature]  
 Deputy Clerk

(Enter above full name of plaintiff or plaintiffs)

v.

RUDWON GREEN; Correctional Officer  
MR. SCREWS; Correctional Officer

CV124-058

(Enter above full name of defendant or defendants)

I. Previous lawsuits

- A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action? Yes ☒ No ☐

If your answer to A is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

— 1. Parties to this previous lawsuit:

Plaintiffs: SHAQUILLE RASHAD JENKINS

Defendants: Officer Green, Officer Screws, A.S.M.P.,  
Edward Philbin, Michael Paschal, A. Jackson, L. Jackson

2. Court (if federal court, name the district; if state court, name the county):

Southern District of Georgia

3. Docket number: 1:23-CV-00035-JRH-BKE

4. Name of judge assigned to case: Chief Judge J. Randall Hall

5. Disposition  
(for example, was the case dismissed? appealed? is it still pending?):

Appealed & dismissed

6. Approximate date of filing lawsuit: April 7<sup>th</sup>, 2023

7. Approximate date of disposition: \_\_\_\_\_

8. Were you allowed to proceed *in forma pauperis* (without prepayment of fees)? Yes ☒ No ☐

- B. While incarcerated or detained in any facility, have you brought any lawsuits in federal court which deal with facts other than those involved in this action?  
Yes ☒ No ☐

If your answer to B is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to previous lawsuit:

Plaintiffs: SHAQUILLE RASHAD JENKINS

Defendants: Novel Ellis, Melvin Chambers, Saleena Williams,  
Newton County Sheriff Office

2. Court (name the district):

Northern District of Georgia

3. Docket number: 1:21-CV-0834

4. Name of judge assigned to case: Thomas W. Thrash

5. Disposition  
(for example, was the case dismissed? appealed? is it still pending?):

Dismissed

6. Approximate date of filing lawsuit: Feb 26<sup>th</sup>, 2021

7. Approximate date of disposition: Unknown

8. Were you allowed to proceed *in forma pauperis* (without prepayment of fees)? Yes ☒ No ☐

C. As to any lawsuit filed in federal court where you were allowed to proceed *in forma pauperis*, was any suit dismissed on the ground that it was frivolous, malicious, or failed to state a claim? Yes ☒ No ☐

1. If your answer to C is yes, name the court and docket number for each case:

Northern District Court of Georgia 1:21-CV-2086  
Southern District Court of Georgia 1:23-CV-00035  
Northern District Court of Georgia 1:21-CV-0834

II. Place of present confinement: Wilcox State Prison

A. Is there a prisoner grievance procedure in this institution? Yes ☒ No ☐

B. Did you present the facts relating to your complaint to the appropriate grievance committee? Yes ☒ No ☐

C. If your answer to B is yes:

1. What steps did you take? Filed grievance.

2. What was the result? Criminal Investigation Unit of Georgia Department of Corrections conducted an investigation which resulted in Officer Audron Green being fired



I. Previous Lawsuits (Additional)

2. Parties to this Previous Lawsuit:

Plaintiff: Shaquille Rashad Jenkins

Defendants: Audwon Green, Correctional Officer;  
MR. Screws, Correctional Officer;  
Michael Paschal, Deputy Warden; and  
La'Quenah Jackson, Counselor

A. Court

Southern District of Georgia

Docket Number: CV 124-012

Name of Judge: J. Randall Hall

Disposition: Dismissed Voluntarily

Approximate Date of Filing: February 1, 2024

Approximate date of disposition: Unknown

Were You allowed to Proceed in forma Pauperis? Yes ☒ No ☒

B. While incarcerated or detained in any facility, have you brought any Lawsuits in Federal Court which deal with facts other than those involved in this action? (

Yes ☒ No ☐

(Additional)

1. Parties to Previous Lawsuit:

Plaintiffs: Shaquille Rashad Jenkins

Defendants: Saleena Williams, Johnson, Noel Ellis, Melvin Chambers

2. Court. Northern District of Georgia

3. Docket number: 1:21-CV-2086

4. Name of Judge assigned to case: Chief Judge J. Randall Hall

5. Disposition  
Still Pending.

6. Approximate date of Filing Lawsuit:  
May 17<sup>th</sup>, 2021

7. Approximate date of disposition:  
Unknown

8. Were You allowed to Proceed in forma Pauperis

Yes ☐ No ☒

3. Did you appeal any adverse decision to the highest level possible in the administrative procedure? Yes ☒ No ☐

If yes, what was the result? Criminal Investigation Unit  
Conducted an Investigation,

- D. If you did not utilize the prison grievance procedure, explain why not: \_\_\_\_\_

### III. Parties

(In Item A below, list your name as plaintiff and current address. Provide the name and address of any additional plaintiffs on an attached sheet.)

- A. Name of plaintiff: Shaquille Rashad Jenkins GDC#1000319681  
 Address: Wilcox State Prison  
P.O. Box 397  
ABBEVILLE, GA 31001

(In Item B below, list the defendant's full name, position, place of employment, and current address. Provide the same information for any additional defendants in Item C below.)

- B. Name of defendant: Audwon Green  
 Position: Correctional Officer  
 Place of employment: Augusta State Medical Prison  
 Current address: 3001 Gordon Hwy  
Grovetown, Georgia 30813

- C. Additional defendants: MR. Screws  
Correctional Officer  
Augusta State Medical Prison  
3001 Gordon Hwy  
Grovetown, Georgia 30813

## IV: Statement of Claim

State here as briefly as possible the FACTS in your case. Describe how each defendant is personally involved in the depriving you of your rights. You must include relevant times, dates, places, and names of witnesses. DO NOT GIVE LEGAL ARGUMENTS OR CITE ANY CASES OR STATUTES. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

- (1) On December 19<sup>th</sup>, 2021 while housed at Augusta State Medical Prison Segregation Unit, Defendant Green refused to Feed Plaintiff Jenkins his Vegan Diet Meals more than once. Plaintiff was on Restricted Vegan due to Religious belief. Plaintiff Filed grievance against Defendant Green.
- (2) On December 23<sup>rd</sup>, 2021 Defendant Green retaliated against Plaintiff Jenkins after he filed grievances on Defendant Green by approaching Plaintiff and repeatedly punching him in the Face Causing the Plaintiff's face to Swell and fractured his Jaw.
- (3) Defendant Screws who stood by and allowed Defendant Green to assault Plaintiff did not intervene nor did he correct Defendant's Green misconduct and malicious act.
- (4) Defendant Green did not provide nor notify Medical Staff that Plaintiff was injured [after] assaulting him and having knowledge that Plaintiff was in need for Medical attention.
- (5) Defendant Screws did not Provide nor notify Medical Staff Concerning the Plaintiff's injuries after [he] had knowledge that the plaintiff was assaulted by Defendant Green.
- (6) Approx. Five days Later Nurses examined Plaintiff's Face and documented that he in fact had a Swollen Jaw.



## Legal Claims.

- (2) Defendant Green used excessive force against Plaintiff Jenkins by repeatedly punching him in the face fractured Jenkins Jaw, when Jenkins was not violating any Prison rule and was not acting disruptively. Defendant Green's action violated Plaintiff Jenkins's rights Under the Eighth Amendment to the United States Constitution and Caused Plaintiff Jenkins Pain, Suffering, Physical injury, and emotional distress.
- (2) By witnessing Defendant Green's illegal action, Failing to correct that misconduct, and Condoning it, Defendant Screws is also Violating Plaintiff's Jenkins rights under the Eighth Amendment to the United States Constitution and Causing Plaintiff Jenkins Pain, Suffering, Physical injury, and emotional distress.
- (3) By harming Plaintiff Jenkins with Physical Violence for exercise of his right to seek redress from the Prison through use of the Prison grievance system, Defendant Green retaliated against Plaintiff Jenkins Unlawfully, in violation of Plaintiff Jenkins's rights under the First Amendment to the United States Constitution. These illegal actions caused injury to Plaintiff Jenkins First Amendment rights.
- (4) By not providing Plaintiff Jenkins with adequate medical care after knowingly assaulting him physically, Defendant Green showed Deliberate Indifference towards Plaintiff Jenkins medical needs and Personal Safety, violated Plaintiff Jenkins rights Under the Eighth Amendment to the United States Constitution, Caused Plaintiff Jenkins Pain, Suffering, and emotional distress.

V. Relief

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

(7) Wherefore, Plaintiff respectfully prays that this court enter judgment granting plaintiff:

(8) A declaration that the acts and omissions described herein violated Plaintiff's rights under the Constitution and Laws of the United States

(9) Plaintiff Jenkins seeks Compensatory damages in the amount of \$50,000 against each defendant (Green & Screws)

(10) Plaintiff also seeks Punitive damages in the amount of \$100,000 against Defendant Green (only)

(11) Plaintiff Request for a Jury trial on all issues triable by jury

(12) Plaintiff request for recovery of all cost in suit

(13) also any additional relief this court deems just, proper, and equitable.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 25<sup>th</sup> day of April, 2024.

Prisoner No. 1000319687

Shaquille Jenkins  
(Signature of Plaintiff)



**CERTIFICATE OF SERVICE**

This is to certify that I have this day served the opposing  
Party(ies) to this action with a true and correct copy of the  
within and foregoing 42 U.S.C § 1983

Complaint Civil Suit

by placing a copy of same in the United States Mail and/or  
Institutional Mailbox, with adequate postage thereon to ensure  
prompt delivery, and addressed it to:

Audwon Green  
3001 Gordon Hwy.  
Grovetown, GA 30813

MR. Screws  
3001 Gordon Hwy.  
Grovetown, GA 30813

This 25<sup>th</sup> day of APRIL, 2024.

Shaquille Rashad Jenkins  
Shaquille R. Jenkins  
ProSe

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA

SHAQUILLE RASHAD JENKINS

V.

AUDWON GREEN; Correctional Officer  
MR. SCREWS; Correctional Officer

SUMMONS

Civil Action No. \_\_\_\_\_

TO THE ABOVE-NAMED DEFENDANTS:

You are hereby Summoned and required to Serve upon Plaintiff, whose address is [Wilcox State Prison, P.O. Box 347, ABBEVILLE, GEORGIA 31001] an answer to the Complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service, or 60 days if the U.S. Government or Officer Agent thereof is a defendant. If you fail to do so, Judgment by default will be taken against you for the relief demanded in the Complaint.

Clerk of The Court

Date: \_\_\_\_\_

Plaintiff Signature Shaquille R Jenkins

Date: 4/25/2024

Shaville Rashad Jenkins  
DOC #1000319687  
Wilcox State Prison  
P.O. Box 397  
ABBEVILLE, GA 31001

ATLANTA GA. RPDC 302

2 MAY 2024 PM 10

CLERK, U.S. DISTRICT  
POST OFFICE BOX 1130  
AUGUSTA, GEORGIA 3

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